

# Grant Law, LLC

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January 21, 2024 (Filed in Pacer Only)

Hon. Renee Bumb, USDJ  
Mitchell H. Cohen Building  
& U.S. Courthouse 4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**RE: Abdullah versus Rowan University case number 1:21 –cv– 19256- Concerning defendants’ motion to dismiss with prejudice currently pending**

Dear Judge Bumb:

Please be advised that although I handled federal cases over 20 years ago and I am an active trial attorney, I have not been handling federal cases for quite some time.

On Friday afternoon, I was upgraded into the PACER system after experiencing difficulty over the past week with certain requirements that can only be resolved through numerous phone calls, I made directly with some of the PACER representatives, who finally corrected the problem for me.

As a result, until this past Friday afternoon when the problem was resolved, I was unaware of Your Honor's December 22, 2024 order, which apparently deemed the motion unopposed due to the delays by the pro se defendant to retain counsel and/or respond in a timely fashion.

Respectfully, I would ask for time to respond on her behalf, as I mentioned in my previous correspondence of January 12, 2024 (because of PACER problems it was uploaded January 19, 2024) until February 9, 2024, as my client was unaware and did not advise me of the December 22, 2023 order.

This is obviously a dispositive and critical motion, and under the circumstances, it is genuinely hoped that the court will agree that it is appropriate to allow her to retain counsel even at this tardy date.

Thank you for the Court's consideration in this matter.

Respectfully submitted,  
Gary Grant

Attorney on motion to dismiss with prejudice  
Defendant Shariese Abdullah  
New Jersey Bar number 041011984